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7 Attorneys for  
8 GEORGE M. VLAZAKIS; MARIA BARBIS; JOHN BARBIS;  
and ATHANASIA V. VLAZAKIS

9 UNITED STATES BANKRUPTCY COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 In Re:	)	CASE NO. 19-30088 (DM)
	)	
13 PG&E CORPORATION,	)	Chapter 11
	)	
14 And	)	<b>NOTICE OF HEARING ON MOTION</b>
	)	<b>AS TO INAPPLICABILITY OF</b>
15 PACIFIC GAS AND ELECTRIC COMPANY,	)	<b>AUTOMATIC STAY, AND IN THE</b>
	)	<b>ALTERNATIVE FOR RELIEF FROM</b>
16 Debtors,	)	<b>STAY</b>
	)	
17 <input type="checkbox"/> Affects PG&E Corporation	)	Date: December 17, 2019
18 <input checked="" type="checkbox"/> Affects Pacific Gas and Electric Company	)	Time: 10:00 a.m.
19 <input type="checkbox"/> Affects Both Debtors	)	Dept.: 17
	)	450 Golden Gate Ave
	)	San Francisco, CA 94102
20 *All papers shall be filed in the Lead Case, no. 19-30088 (DM)	)	Judge: Dennis Montali
	)	
	)	Objection Deadline: December 12, 2019
	)	Time: 4:00 p.m. (Pacific Time)

22 TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED PARTIES:

23 PLEASE TAKE NOTICE that a hearing on the Motion as to Inapplicability of Stay, and in  
24 the Alternative for Relief from Stay filed by George M. Vlazakis, Maria Barbis, John Barbis, and  
25 Athanasia V. Vlazakis ("Vlazakis Defendants:") will be heard by the Honorable Dennis Montali  
26 on December 17, 2019 at 10:00 a.m. in the United States Bankruptcy Court for the Northern  
27 District of California located at 450 Golden Gate Avenue, 16<sup>th</sup> Floor, San Francisco, California in  
28 Courtroom 17. Vlazakis Defendants are requesting through the Motion that the Bankruptcy Court

1 issue an order that the automatic stay does not apply to the state court action filed by PG &E  
2 entitled Pacific Gas & Electric Company v. Athanasia V. Vlazakis, et al, California Superior  
3 Court, County of Alameda, Case number RG19021463, or in the alternative, for an order lifting  
4 the bankruptcy stay for “cause” as to the state court action filed by PG &E entitled Pacific Gas &  
5 Electric Company v. Athanasia V. Vlazakis, et al, California Superior Court, County of Alameda,  
6 Case number RG19021463, in order that the Vlazakis defendants can assert a cross-complaint  
7 against PG & E and otherwise litigate the case without any restrictions caused by the Debtor filing  
8 for relief under the Bankruptcy Code.

9       The Motion is brought per 11 USC Section 362(a)(1) and 362(d)(1), and for cause. The  
10 Motion is based on this Notice, the Motion, the Declarations of Ronald F. Berestka and Maria  
11 Barbis, and any exhibits attached thereto, all filed in support of the Motion and upon all other  
12 pleadings and papers on file herein and such oral and documentary evidence as may be presented  
13 at the hearing on the Motion.

14       PLEASE TAKE FURTHER NOTICE that the Debtor is advised to appear personally or by  
15 counsel at the preliminary hearing as provided in Local Rule 4001-1(a) and that failure to so  
16 appear may result in the Court granting the relief requested without further hearing, including the a  
17 determination that the automatic stay does not apply to the above-referenced state court action, or  
18 the lifting of the automatic state to allow the Vlazakis defendants to pursue its proposed cross-  
19 complaint and the resolution of the state court lawsuit without any restrictions from the automatic  
20 stay. Respondent may but will not be required to file responsive pleadings, points and authorities,  
21 and declarations in response to the Motion as provided in Bankruptcy Local Rule for the Northern  
22 District of California 4001-1(f).

23       PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion must  
24 be in writing, filed with the Bankruptcy Court, and served on the counsel for Vlazakis Defendants  
25 at the above-referenced address so as to be received by no later than 4:00 p.m. (Pacific Time) on  
26 December 12, 2019. Any opposition or response must be filed and served on all “Standard  
27 Parties” as defined the Second Amended Order Implementing Certain Notice and Case  
28 Management Procedures entered by the Court on May 13, 2019 (“Case Management Order”). Any

1 relief required in the Motion may be granted without a hearing if no opposition is filed and served  
2 in accordance with the Case Management Order. In Deciding the Motion, the Court may consider  
3 any other document filed in these Chapter 11 Cases and Related Adversary Proceedings.

4 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers  
5 can be viewed and/or obtained: (i) by accessing the Court's website at  
6 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden  
7 Gate Ave, San Francisco, CA 94102, or (iii) from the Debtor's notice and claims agent, Prime  
8 Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 for U.S.  
9 based parties or +1 (929) 333-8977 for international parties or by email at  
10 [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a PACER password is needed to access documents on the  
11 Bankruptcy Court's website.

12 DATED: November 22, 2019

STONE & ASSOCIATES

13  
14 By



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Attorneys for Defendants

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